



Oregon

John A. Kitzhaber, MD, Governor

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February 26, 2014

Mr. Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Re: Integrated Groundwater Monitoring Program
NW Natural "Gasco Site" and Siltronic Corporation Facility
Portland, Oregon
ECSI Nos. 84 and 183**

Dear Mr. Wyatt:

The Department of Environmental Quality (DEQ) reviewed the "NW Natural Integrated Groundwater Monitoring Program, Gasco and Siltronic Properties, Portland, Oregon" letter dated November 20, 2013 (Integrated Monitoring Program). The Integrated Monitoring Program provides NW Natural's approach for conducting groundwater monitoring at the Gasco Site and adjoining Siltronic Corporation facility through June 2014. Hahn and Associates, Inc. (Hahn) prepared the Integrated Monitoring Program on behalf of NW Natural.

BACKGROUND

NW Natural is conducting groundwater monitoring on the Gasco Site and adjoining Siltronic Corporation (Siltronic) facility to support groundwater source control planning, design, and implementation along the shoreline of the Gasco Site and the northern portion of the Siltronic facility; ongoing monitoring of groundwater beneath the Gasco Site; and the remedial investigation (RI) of manufactured gas plant (MGP) contamination on the Siltronic facility.

The groundwater monitoring work NW Natural is performing at the two sites is organized into two general programs, including the "routine groundwater monitoring program" (Routine Program) and the Alluvium water-bearing zone (WBZ) hydraulic control and containment (HC&C) system "performance monitoring program" (Performance Monitoring Program). The HC&C system represents the groundwater source control measure for the Alluvium WBZ.

In general, the Routine Program consists of monitoring wells being sampled to evaluate groundwater beneath the Gasco Site and for purposes of the Siltronic MGP RI. The Performance Monitoring Program is designed to evaluate the operation and performance of the HC&C system and is documented in the Final Test Plan¹ (see Table 3 [Source Control Monitoring Plan]). There is overlap in the two programs with monitoring wells in the Routine Monitoring Program being included in the Performance Monitoring Program.

¹ Anchor QEA, LLC, 2013, "Final Groundwater Source control Extraction System Test Plan – NW Natural Gasco Site," November (received November 13, 2013), a plan prepared for NW Natural.

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INTEGRATED MONITORING PROGRAM

In November 2013, NW Natural initiated testing of the HC&C system. In our September 22, 2011 letter commenting on the Revised Interim Design Report², DEQ indicated the HC&C system would alter hydraulic conditions in the Alluvium WBZ, and requested NW Natural to assess changes in historic groundwater trends in response to system operation. DEQ's request included sampling new and existing installations within 3-months of starting the system for this purpose. DEQ's request was also intended to achieve the goal of collecting two sets of groundwater samples for analysis during the first six months of HC&C operation.

The Integrated Monitoring Program combines the Routine Monitoring Program and the Performance Monitoring Program for two monitoring events (i.e., March and June 2014). Based on this information and initiation of HC&C testing in November 2013, the Integrated Monitoring Program addresses DEQ's September 22, 2011 comments and is approved subject to the following clarifications:

- DEQ's approval applies to the lists of monitoring wells identified for sampling during the March 2014 and June 2014 events.
- Table 3 of the Final Test Plan should be referred to for information regarding transducers and transducer-equipped installations.
- Although not indicated in the Integrated Monitoring Program, following the June 2014 monitoring event DEQ requests NW Natural to conduct groundwater sampling in September 2014 and then semi-annually from there on (i.e., during the months of March and September consistent with the historic long-term monitoring schedule).

DEQ further understands from the Integrated Monitoring Program and Section 4.3 of the Final Test Plan, that NW Natural will propose program modifications following completion of the June 2014 sampling event and after 1-year of HC&C system testing and operations. The following clarifications apply to the timing and scope of NW Natural's proposals and are consistent with DEQ's September 22, 2011 letter and our August 9, 2012 comments on the Construction Design Report³.

- Following the June 2014 event and prior to initiating field sampling activities in September 2014, DEQ requests that NW Natural submit a proposal for our review and approval that modifies the Integrated Monitoring Program by reducing: 1) the numbers of monitoring wells (e.g., installations in close proximity that provide duplicative data); and/or 2) the frequency of sampling at selected installations (e.g., semi-annual to annual sampling of selected uplands monitoring wells).
- After completing one-year of monitoring HC&C system testing and operations (i.e., after the March 2015 monitoring event) NW Natural may propose further modifications to the

² Anchor QEA, LLC, 2011, "Draft Groundwater Source Control Final Design Report, NW Natural Gasco Site," May (received May 9, 2011), a report prepared on behalf of NW Natural (recognized by DEQ as the equivalent of the Revised Groundwater Source Control Interim Design Report).

³ Anchor QEA, LLC, 2012, "Revised Groundwater Source Control Construction Design Report, NW Natural Gasco Site," January (received January 31, 2012), a report prepared for NW Natural.

groundwater monitoring program for DEQ's review and approval by refining the list of sampling parameters at selected monitoring wells.

In general, any modifications NW Natural proposes making subsequent to the June 2014 and March 2015 events should accomplish the objectives of maintaining groundwater datasets and trends across the two sites and achieving the data collection objectives of the Performance Monitoring Program.

NEXT STEPS

DEQ is not requesting the Integrated Monitoring Program to be revised and resubmitted. Prior to initiating the March 2014 monitoring event DEQ requests that NW Natural confirm the clarifications listed above are accepted and incorporated into the groundwater monitoring program going forward.

Please contact me with any questions you might have regarding this letter.

Sincerely,



Dana Bayuk
Project Manager
Northwest Region Cleanup Section

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ECSI No. 84 File
ECSI No. 183 File